

United States District Court

EASTERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

WARRANT FOR ARREST

ANSON CHI

CASE NUMBER: 4:12mj253

To: The United States Marshal
and any Authorized United States Officer

YOU ARE HEREBY COMMANDED to arrest ANSON CHI and bring him forthwith to the nearest magistrate
to answer a(n)

☐ Indictment ☐ Information ☒ Complaint ☐ Order of court ☐ Violation Notice ☐ Probation Violation Petition

On or about June 18, 2012, in the Eastern District of Texas, Anson Chi, defendant, knowingly possessed a firearm, to wit, a destructive device manufactured through the use of chemicals and a combination of parts intended for use in converting a readily assembled explosive, not registered to him in the National Firearms Registration and Transfer Record, in violation of 26 U.S.C. §§ 5845, 5861(d), and 5871.

DON D. BUSH

Name of Issuing Officer

Signature of Issuing Officer

United States Magistrate Judge

Title of Issuing Officer

June 20, 2012 at Plano, Texas

Date and Location

Bail fixed at \$

by

Name of Judicial Officer

ORIGINAL

United States District Court

EASTERN

DISTRICT OF

TEXAS

UNITED STATES OF AMERICA

V.

ANSON CHI

CRIMINAL COMPLAINT

CASE NUMBER: 4:12mj253

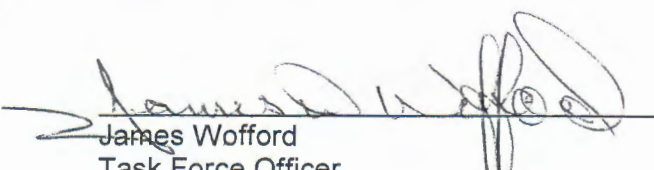
I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief.

On or about June 18, 2012, in the Eastern District of Texas, Anson Chi, defendant, knowingly possessed a firearm, to wit, a destructive device manufactured through the use of chemicals and a combination of parts intended for use in converting a readily assembled explosive, not registered to him in the National Firearms Registration and Transfer Record, in violation of 26 U.S.C. §§ 5845, 5861(d), and 5871.

I further state that I am a Detective with the Plano Police Department assigned as a Task Force Officer with the North Texas Joint Terrorism Task Force at the Federal Bureau of Investigation (FBI) and that this complaint is based on the following facts:

See attached Affidavit of Task Force Officer James Wofford, which is incorporated and made a part hereof by reference.

Continued on the attached sheet and made a part hereof: XX Yes No


James Wofford
Task Force Officer
Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, on this 20th day of June, 2012, at Plano, Texas.

DON D. BUSH
UNITED STATES MAGISTRATE JUDGE
Name & Title of Judicial Officer


Signature of Judicial Officer

AFFIDAVIT

I, James Wofford, having been duly sworn, depose and state as follows:

Introduction

1. I am a Detective with the Plano Police Department assigned as a Task Force Officer with the North Texas Joint Terrorism Task Force at the Federal Bureau of Investigation (FBI), duly appointed and acting according to law. I have been a law enforcement officer for 22 years, and am currently assigned to the Dallas Division of the FBI, Counter Terrorism Unit, where I investigate domestic and counter terrorism crimes. I have experience in such investigations through training in seminars, classes, and day-to-day work related to the investigation of this type of case

2. I make this affidavit in support of a criminal complaint charging Anson Chi with having violated 26 U.S.C. §§ 5845, 5861(d), and 5871, in that, on or about June 18, 2012, in the Eastern District of Texas, Anson Chi, defendant, knowingly possessed a firearm, to wit, a destructive device manufactured through the use of chemicals and a combination of parts intended for use in converting a readily assembled explosive, not registered to him in the National Firearms Registration and Transfer Record.

Summary of Probable Cause

3. On 06/17/12 at 2345 hrs, officers with the Plano Police Department Patrol Division were dispatched to the area of West Parker Road and Starlight Trail Plano, Collin County, Texas in reference to a possible shooting call. While enroute to the location, Plano Police Dispatch advised responding officers that the call had been changed to a hit and run accident involving a pedestrian. Dispatch further updated responding officers that residents in the immediate area had heard a loud explosion.

Upon arrival at the scene, Officer J. Thomas #1645 of the Plano Police Department Patrol Division interviewed JK and LAD, who were present at the scene. JK and LAD advised Officer Thomas that they observed a man to be screaming and standing on West Parker Road near Starlight Trail and then fall to the ground in the middle of the street. The injured subject had advised JK and LAD that he had been jogging down West Parker Road and had been struck by a vehicle. Officer Thomas and responding officers began to investigate the call as an alleged traffic crash. The officers observed a blood trail which appeared to originate from a section of Atmos gas pipeline, which was located near the scene, along West Parker Road near the intersection of Jermes Landing, Plano, Collin County, Texas. The subject was the only person present or injured at the scene and he was transported by Plano Fire Department personnel to Medical Center Plano for treatment. Officer Thomas observed blood splatter on the Atmos gas pipeline pipes and on a wooden fence section that separated the exposed pipes from an adjacent alleyway. Officer Thomas further observed a large circular depression in the top surface in one of the pipes and Officer Thomas could smell leaking natural gas. Based on his training and observations, Officer Thomas summoned Atmos Gas and members of the Plano Police Department Bomb Squad.

4. Detective Ricky Hendrix of the Plano Police Department Bomb Squad responded to the scene along with Special Agents of the Federal Bureau of Investigations Bomb Team. Detective Hendrix observed the scene and based on his training and experience believed there was evidence present, at the Atmos pipeline on West Parker Road near Jermes Landing, Plano, Collin County, Texas, which indicated the detonation of a improvised explosive device. Detective Hendrix observed the injuries to the

unknown Asian male at Medical Center Plano, who was originally located at the scene. Detective Hendrix believes the subject was standing over an improvised explosive device, when the device detonated. This conclusion is based on the injuries observed by Detective Hendrix and the appearance of the subject having been wearing black nitrile gloves at the time of the improvised explosive device's detonation. Affiant was advised these observations by Detective Hendrix and these observations were based on Detective Hendrix's training and experience.

5. Federal Bureau of Investigations fingerprint technicians took the unknown subject's fingerprints at Medical Center Plano and submitted those fingerprints to A.F.I.S. (Automated Fingerprint Identification System) in an attempt to identify the subject. Detective Ricky Hendrix of the Plano Police Department Bomb Team was advised, that based on a comparison conducted by the automated fingerprint identification system, this comparison revealed the identity of the unknown subject to be Anson Chi (A/M 10/12/78). Detective Ricky Hendrix advised Affiant of these facts.

6. Detective Ricky Hendrix advised Affiant that he was informed of a Plano Police Department arrest report #2012-66158 from 04/12/12 and saw where Anson Chi (A/M 10/12/78) had been arrested at the Walmart Supercenter located at 6000 Coit Road Plano, Collin County, Texas, on that date, for theft. Chi advised arresting officer, K. M. Alley #1689 of the Plano Police Department Patrol Division, during Chi's book-in procedure that his address was 3228 Anchor Drive Plano, Collin County, Texas.

7. Affiant then proceeded to 3228 Anchor Drive Plano, Collin County, Texas, accompanied by Detective Curtis Coburn of the Plano Police Department Intelligence Unit. Affiant observed a light colored Toyota Sedan bearing Texas License

Plate number BD3 P128, to be parked directly in front of 3228 Anchor Drive, Plano, Collin County, Texas. Affiant was advised by Plano Police Dispatch the vehicle registration returned to Anson Chi, 3228 Anchor Drive, Plano, Collin County, Texas.

8. At approximately 4:00 p.m. officers and agents of the Plano Police Department and the FBI contacted a resident located at 3228 Anchor Drive, Plano, Texas. The resident was then identified as Anson Chi's mother, who stated that she owned the house with the subject's father and that the subject did reside at the location.

9. The subject's mother was advised by a Detective by the Plano Police Department that her son had been injured in an explosion and asked for and obtained verbal and written consent to search the premises explosives and components that could be used to manufacture explosives. Anson Chi's mother directed the law enforcement personnel to her son's bedroom, wherein the officers were able to see, in plain view, glass jars containing substances and other items consistent with the manufacture of homemade explosives. Specifically, the officers observed green cannon fuses, jars containing clear liquids, digital scales, multiple measuring cups, "honeycomb" quart size jars and lids, sodium jelly, isopropyl alcohol, sulfuric acid, nitric acid, thermometers, laboratory glassware and equipment, surgical masks, splash suit, filtering material, hot plate, and epoxy putty. Based upon the officers' training and experience, these items constitute explosive device parts and chemicals, the combination of which are intended for use in converting a readily assembled explosive device. Further, evidence recovered by officers at the detonation site is consistent with the items observed and recovered by search warrant from the subject's residence. In addition, there were also various manuals and books dealing with technological slavery and domestic terrorism observed by officers in

the subject's bedroom.

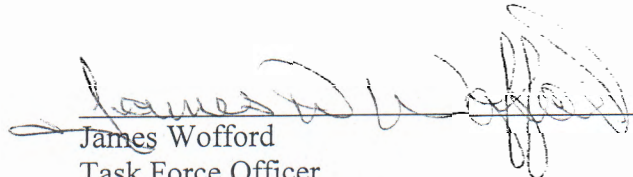
10. Affiant was advised by Alcohol, Tobacco, Firearms and Explosives that the subject was not of record with the National Firearms Registration and Transfer Act.

11. The law enforcement agents also observed a personal computer and a laptop as well as various items of digital storage media. Based on their training and experience, the law enforcement officers are aware that individuals are able to utilize the internet in order to obtain information related to the manufacture of improvised explosive devices and homemade explosives.

12. Based on the foregoing facts and circumstances, affiant believes probable cause exists that Anson Chi has violated 26 U.S.C. §§ 5845, 5861(d), and 5871.

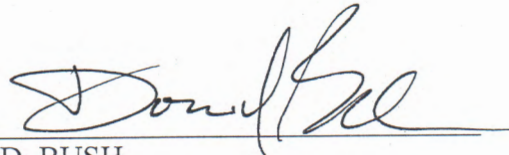
Request for Sealing

13. The information in this affidavit discusses an ongoing criminal investigation that is neither public nor known to all of the targets of the investigation, and describes sensitive investigative techniques. There is therefore good cause to seal these documents, because their premature disclosure may seriously jeopardize the investigation. Accordingly, I respectfully request that all papers in support of this application, including the affidavit and arrest warrant, be sealed until further order of the Court, except as necessary to facilitate the execution of the arrest warrant.



James Wofford
Task Force Officer
Federal Bureau of Investigation

Sworn to and subscribed before me on June 20, 2012.



DON D. BUSH
UNITED STATES MAGISTRATE JUDGE
EASTERN DISTRICT OF TEXAS